



MEMO ENDORSED

March 12, 2021

VIA ECF

Hon. Kenneth M. Karas, U.S.D.J.  
United States District Court  
Southern District of New York  
300 Quarropas Street  
White Plains, New York 10601-4150

Re: *Ramapo Local Dev't Corp. v. Philadelphia Indemnity  
Insurance Company*  
Case No. 7:19-cv-02502

Dear Judge Karas:

Our firm represents Plaintiff, Ramapo Local Development Corp. ("RLDC"), in the above-captioned matter. We are writing jointly with counsel for Defendant Philadelphia Indemnity Insurance Company, to update the Court on the status of the mediation held on March 3, 2021, and to respectfully request that the Court adjourn the status conference scheduled for March 17, 2021.

On March 3<sup>rd</sup>, the parties participated in a mediation which lasted for nearly seven hours. Although the case did not settle, the mediation was productive and the parties have made significant progress. The parties are continuing to work towards a settlement with the assistance of the Mediator, Richard Byrnes of NAM. It was decided at the conclusion of the mediation that Plaintiff would produce certain information to defendant, which is relevant to the parties' settlement discussions, by the end of this week. Plaintiff provided those documents yesterday and the parties have another settlement meeting scheduled this afternoon. Next week, Defendant will contact the Mediator with a response to the Plaintiff's last settlement demand. We expect to know the outcome of all settlement negotiations by no later than March 19<sup>th</sup>.

Therefore, the parties believe it would be more productive to adjourn the conference, if only briefly, until a date after March 19<sup>th</sup> that is convenient for the Court.

We thank the Court for its attention to this matter. Please do not hesitate to contact the undersigned if the Court requires anything further in connection with this request.

**LERNER, ARNOLD & WINSTON, LLP**

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Respectfully submitted,

LERNER, ARNOLD & WINSTON, LLP

/s/ Sean F. McAloon

Sean F. McAloon

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*Granted. The Court will hold a  
teleconference on 4/21/2021 at  
11:30 AM*

SO ORDERED

A handwritten signature in blue ink, appearing to be "MK" or "KMK", written over a horizontal line.

KENNETH M. KARAS U.S.D.J.

*3/16/2021*